From: Kearse, Anne <akearse@motleyrice.com>

Sent: Friday, June 5, 2020 3:52 PM

<amy@mchughfuller.com>

Cc: track2opioiddefendants@reedsmith.com; 2804 Discovery, MDL

<mdl2804discovery@motleyrice.com>; ct2_opioid_team@mail-list com <ct2_opioid_team@mail-

list.com>

Subject: RE: EXTERNAL-RE: City of Huntington Deposition Dates

[EXTERNAL]

EXTERNAL E-MAIL - From akearse@motleyrice.com

Laura, Shortly after you sent around a proposal, Special Master Cohen circulated a draft Deposition Protocol. We have included some edits to his draft. We think this is comprehensive and what is needed for depositions to begin in CT2. Talk soon, Anne

Anne McGinness Kearse | Attorney at Law | Motley Rice LLC 28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 o. 843.216.9140 | f. 843.216.9655 | akearse@motleyrice.com

From: Flahive Wu, Laura < lflahivewu@cov.com>

Sent: Thursday, June 4, 2020 5:11 PM

To: Leyimu, Temitope "Tope" <tleyimu@motleyrice.com>; xALLDEFENDANTS-MDL2804-

Service@arnoldporter.com

Cc: track2opioiddefendants@reedsmith.com; 2804 Discovery, MDL

<mdl2804discovery@motleyrice.com>; Kearse, Anne <akearse@motleyrice.com>

Subject: EXTERNAL-RE: City of Huntington Deposition Dates

Counsel for Huntington,

Defendants accept the following deposition dates:

- Ray Canafax- Monday, June 15, 2020
- Jan Rader- Wednesday, June 17, 2020
- Hank Dial- Thursday, June 25, 2020
- Rocky Johnson- Friday, June 26, 2020

Defendants reserve the right to reschedule or reopen depositions to the extent relevant materials, including the witness's complete custodial file, are not produced reasonably in advance of the deposition.

We will get back to you shortly on the other dates offered.

Best regards,

Laura

Laura Flahive Wu

Covington & Burling LLP One CityCenter, 850 Tenth Street, NW Washington, DC 20001-4956 T +1 202 662 5982 | lflahivewu@cov.com www.cov.com

COVINGTON

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From: Leyimu, Temitope "Tope" < tleyimu@motleyrice.com >

Sent: Wednesday, June 03, 2020 9:52 AM

To: Flahive Wu, Laura < red; xALLDEFENDANTS-MDL2804-Service@arnoldporter.com cc: track2opioiddefendants@reedsmith.com; ct2 opioid team@mail-list.com; 2804 Discovery, MDL

<mdl2804discovery@motleyrice.com>; Kearse, Anne <akearse@motleyrice.com>

Subject: City of Huntington Deposition Dates

[EXTERNAL]

Counsel, please see the attached correspondence regarding City of Huntington Deposition dates.

Thank you,

Temitope "Tope" Leyimu | Attorney at Law | Motley Rice LLC 28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 o. 843.216.9107 | f. 843.216.9450 | tleyimu@motleyrice.com

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